

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: GOODCRANE CORPORATION Debtor	§ § § § §	Case No. 09-34031-H4-11 Chapter 11
--	-----------------------	---

JANET S. NORTHRUP, TRUSTEE V. ABC&P, LLC, BENJAMIN ALMEDA, JR., CORAZON B. ALMEDA, PATRICK B. ALMEDA AND MARIA VICTORIA ALMEDA	§ § § § § § § § § §	ADVERSARY NO. 09-03318 (Consolidated with Adv. Pro. Nos. 09-03324, 09-03332, and 09-03338)
---	--	---

**SECOND AMENDED NOTICE OF INTENTION TO TAKE ORAL DEPOSITION OF
BENJAMIN ALMEDA, JR.**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Bankruptcy Procedure 7030 and Federal Rule of Civil Procedure 30, Plaintiff Janet S. Casciato-Northrup, Chapter 11 Trustee of the Bankruptcy Estate of GoodCrane Corporation, will take the oral deposition of Benjamin Almeda, Jr. on **Wednesday, April 14, 2010, at 9:30 a.m.**, at the offices of HughesWattersAskanase, LLP, Three Allen Center, 333 Clay Street, 29th Floor, Houston, Texas 77002. The deposition will be recorded by stenographic means by a court reporter. The deposition will continue from day-to-day thereafter until completed.

You are invited to attend and cross-examine.

Respectfully submitted,

HUGHES WATTERS ASKANASE, LLP

By: 
Rhonda R. Chandler
State Bar No. 04101600
333 Clay, Suite 2900
Houston, Texas 77002
Tel: 713-759-0818
Fax: 713-759-6834
Email: rchandler@hwa.com

ATTORNEYS FOR PLAINTIFF


CERTIFICATE OF SERVICE

I hereby certify that I served a true and complete copy of the *Notice of Intent to Take Oral Deposition* on all parties shown below, by first class mail, facsimile, or the court's ECF notice system, on February 18, 2010.

Sidney H. Scheinberg
2200 One Galleria Tower
13355 Noel Rd., LB 48
Dallas, TX 75240

Margaret M. McClure
909 Fannin, Suite 3810
Houston, TX 77010

Diane Tebelius
Lesourd & Patten, P.S.
600 University Street, Suite 2401
Seattle, WA 98101


Rhonda R. Chandler